

FILED

AUG - 6 2019

UNITED STATES DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 SAN ANTONIO DIVISION

CLERK, U.S. DISTRICT COURT
 WESTERN DISTRICT OF TEXAS
 BY DEPUTY

UNITED STATES OF AMERICA,
 Plaintiff,

VS.

KUNAL KALRA,

Defendant.

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SA 19 CR 0557

INFORMATION

Ct. 1: 18 U.S.C. §1956(a) & (h)
 Conspiracy to Launder
 Monetary Instruments

XR

THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

[18 U.S.C. §1956(a) & (h)]

From on or about September 2015 and continuing through and including the date of this indictment, in the Western District of Texas, the Southern District of Texas, and the Central District of California, Defendant,

KUNAL KALRA,

did knowingly combine, conspire, confederate, and agree with others known and unknown, to knowingly conduct and attempt to conduct financial transactions affecting interstate commerce, knowing that the property involved in such financial transactions represented the proceeds of some form of unlawful activity, such property being, in fact, the proceeds of a specified unlawful activity, to wit: conspiracy to distribute a controlled substance in violation of 21 U.S.C. §§ 841 & 846, knowing that the transaction is designed in whole or in part to conceal or disguise the nature, the location, the source, the ownership, or the control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i), all in violation of Title 18, United States Code, Section 1956(h).

NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE

[See Fed.R.Crim.P. 32.2]

I.

Money Laundering Violations and Forfeiture Statutes

[Title 18 U.S.C. § 1956(a)(1)(B)(i) and (h), subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(1)]

As a result of the foregoing criminal violations set forth in Count One, the United States of America gives notice to Defendant **KUNAL KALRA** of its intent to seek the forfeiture of the property described below upon conviction pursuant to Fed. R. Crim. P. 32.2 and Title 18 U.S.C. § 982(a)(1), which states:

Title 18 U.S.C. § 982. Criminal forfeiture

(a)(1) The court, in imposing sentence on a person convicted of an offense in violation of section 1956, 1957. . . of this title, shall order that the person forfeit to the United States any property, real or personal, involved in such offense, or any property traceable to such property.

This Notice of Demand for Forfeiture includes, but is not limited to the following property:

II.

Money Judgment

Money Judgment: A sum of money equal to **Three Hundred Ninety-One Thousand Four Hundred Seven Dollars (\$391,407.00)** which represents the value of any proceeds obtained directly or indirectly, and any property involved in, the violations of Count One, for which Defendant **KUNAL KALRA** is liable.

III.


Substitute Assets

If any of the property described above as being subject to forfeiture for the violations set forth above, as a result of any act or omission of Defendant **KUNAL KALRA**:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States of America to seek forfeiture of any other property, up to the value of said money judgment, as substitute assets pursuant to Title 21 U.S.C § 853(p) and Fed. R. Crim. P. 32.2(e)(1).

JOHN F. BASH
UNITED STATES ATTORNEY

BY: 
SARAH WANNARKA
Assistant United States Attorney